

**II. Prior Art Rejections:**

*Claims 1, 3, 6 and 7*

Claims 1, 3, 6 and 7 are rejected under 35 U.S.C. 103(a) as being unpatentable over Heimbürger (5,889,890) in view of Kohiyama (5,867,219). Applicant respectively traverses the rejection in view of the following remarks.

Preliminarily, Applicant points out two exemplary features of the present application that will help the Examiner's understanding. The first one includes a technology of changing horizontal/vertical frequencies using a motion detection memory used by an MPEG decoding block without an additional motion detection memory. The second one is a technology of changing horizontal/vertical frequencies by increasing a read clock frequency of a prediction memory and a B picture memory of the MPEG decoding block, compared to a general scanning method.

It is pointed out that any disclosure in Heimbürger regarding a technique of interpolating a signal using a field memory after decoding does not disclose details of changing the horizontal/vertical frequencies using the motion detection memory in the decoding block. Also, the memory controller 16 of Kohiyama controls the memory 17 for MPEG decoding and does not disclose a data switching portion that changes the frequencies by increasing a switching frequency using a memory used in MPEG decoding.

Claim 1 was previously amended to describe that the prediction memory switching portion is for switching *the I picture data, the P picture data and the B picture data* output from

the decoding block to the prediction memory or the B picture memory depending on the type of picture. Claim 7 was added in the previous Amendment to contain a similar feature.

The Examiner acknowledges that Heimburger does not disclose the prediction memory switching portion for switching *the I picture data, the P picture data and the B picture data* output from the decoding block to the prediction memory or the B picture memory depending on the type of picture. (See Office Action, page 3, last paragraph.)

Thus, the Examiner contends that Kohiyama discloses a memory controller that can switch the I picture data, the P picture data and the B picture data as claimed. In particular, the Examiner cites to Fig. 3 of Kohiyama and asserts that element 16 is a memory controller that can “manage the switching of image data stored in memory 17, storing the I, P and B pictures, depending on the picture type needed.” (See Office Action, page 4, lines 3-6.)

Applicant takes this opportunity to explain why the applied references do not teach nor suggest the claimed features. In particular, Kohiyama does not teach or suggest switching the claimed I picture data, the P picture data and the B picture data *output from a decoding block to a prediction memory or a B picture memory* depending on the type of picture. Rather, Kohiyama discloses that the memory 17 (i.e., MPEG-decoding-purpose memory) temporarily stores image information before it is read by the variable-length-decoding unit 11 via the bus 30 and the memory controller 16. (See Kohiyama col. 6, lines 57-65.)

The decoding block of claim 1 is described as being for restoring an MPEG signal, and the decoding block of claim 7 is described as being for decoding an MPEG signal. The memory controller 16 of Kohiyama does not output the data from a decoding block to a prediction

memory or a B picture memory depending on the type of picture. Instead, the applied memory controller 16 outputs data from the memory 17 (MPEG-decoding-purpose memory), through the bus 30, to the decoding unit 11 to decode the information. (See Kohiyama col. 2, lines 18-19). Thus, the applied memory controller 16 of Kohiyama does not output data from a decoding block to a prediction memory or B picture memory. This is because the memory 17 is not a decoding block, but is instead a temporary storage area for data before it is sent to the decoding unit 11.

Therefore, even if the teachings of Kohiyama were applied to Heimburger, the features of independent claims 1 and 7, along with dependent claims 3 and 6, would not have been taught nor suggested.

Further, claim 1 was also previously amended to describe that the output data switching portion is for “performing switching control to increase a frequency...” Claim 7 describes that the output data switching portion is for “performing switching control to change a frequency...” The Examiner again cites column 5, line 60 to column 7, line 5 of Heimburger and contends that “the motion estimator [5] applies all of the information needed to process the increasing of the switching frequency of data stored in memory 3 and the outputting of the converted data.” Applicant respectfully emphasizes that the motion estimator does not perform switching control to increase a frequency with which data is output from the prediction memory and the B picture memory with respect to a general scanning method, as claimed. That is, the motion estimator 5 has no control over the field memory 3 or the frequency with which data is output, and would not have taught nor suggested the features of claim 1 or claim 7, such that the rejection should be withdrawn.

Moreover, we would submit that, in accordance with MPEP § 707.07(f), “where applicant traverses any rejection, the examiner, should, if he or she repeats the rejection, take note of the applicant’s argument and answer the substance of it.” Although the Examiner made substantially the same rejection, he did not address Applicant’s submission that the motion estimator 5 has no control over the field memory 3 or the frequency with which data is output. The Examiner is requested to explain his position regarding the deficient motion estimator if an attempt to maintain the rejection is made. Although, Applicant believes that the Examiner will better understand the invention in view of preceding remarks so as to place the case in condition for allowance.

*Claim 2*

Claim 2 is rejected under 35 U.S.C. 103(a) as being unpatentable over Heimbürger (5,889,890) and Kohiyama (5,867,219) in view of Hackett (5,642,170). Applicant respectively traverses the rejection in view of the following remarks.

The Examiner acknowledges that Heimbürger does not disclose the features of claim 2 and cites Hackett for allegedly teaching these features. Applicant submits that claim 2 is patentable over the applied references at least by virtue of claim 2 depending on claim 1. This is because Hackett fails to make up for the deficient teachings of Heimbürger and Kohiyama in regard to claim 1, such that the rejection should be withdrawn.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

AMENDMENT/RESPONSE UNDER 37 C.F.R. § 1.116  
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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

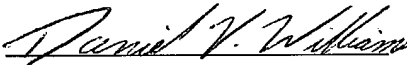
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